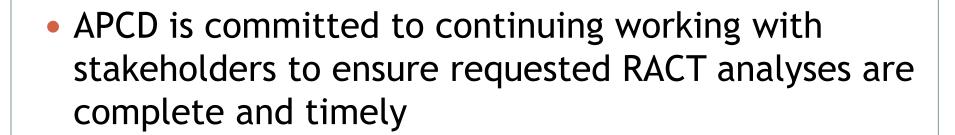


# Colorado's Continuing Major Source RACT Efforts

AIR POLLUTION CONTROL DIVISION
DISCUSSION with STAKEHOLDERS
(EARLY STAKEHOLDER OUTREACH)
JANUARY 19, 2017



# Continued Major Source RACT



- Today's meeting
  - Discuss universe
  - Discuss process
  - Discuss timing





#### **RACT Basics**

- Moderate Ozone NAAs are required to implement RACT
- RACT level controls required for:
  - All VOC source categories subject to a CTG
  - Major sources of VOCs or NOx
- RACT "lowest emission limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility"
- RACT analysis must reflect the "latest information"



### Considerations

- Differences in RACT SIP vs. permit
  - o categorical vs. source specific
  - o existing vs. new/modified
- Reasonably available, technologically and economically feasible
- RACT may range from nothing more to work practices to add-on controls
- 2008 vs. 2015 O3 standard



### Universe

- Sources/points listed in Regulation 7, Section XIX.B.
- Additional sources/points
  - O CIG
    - Latigo Compressor Station (engines 001 & 011)
    - ▼ Watkins Compressor Station (engines 001, 002 & 005)
  - o CENC (boilers 001 & 002)
  - Kerr McGee Gathering Platte Valley Gas Plant (turbine 052; engines 038-041, 047-049)
  - PSCo
    - Denver Steam Plant (boilers 001 & 002)
    - Zuni Station (boilers 001-003)
    - Ft. Lupton Plant (turbines 001 & 002)
    - ➤ Valmont Station (turbine 002)
  - WGR Wattenberg Gas Processing Plant (boiler 012; turbine/duct burner (021; engines 004 and 018)



#### **Process**



- Quarterly meetings/calls with stakeholders
- Targeted discussions with industry/representatives
  - Equipment/process specific
  - RACT analysis related
  - Completion status
- Periodic briefings to RAQC and AQCC
- Categorical rule development for:
  - Engines
  - Boilers
  - Turbines
  - Glass melters
  - Shale kilns
  - Brewing related operations



# **Timing**

- 2017
  - Work w/ industry
  - Investigate established RACT for source categories
- 2018
  - Evaluate RACT analyses
  - Identify source category RACT options
  - Rulemaking to establish categorical RACT for:
    - **×** Boilers
    - **×** Turbines
    - Glass melters
    - Shale kilns

Request: 7/19/18

Hearing: 10/18/18



- Rulemaking to establish categorical RACT for Engines (Request: 4/18/19; Hearing: 7/18/19)
- Rulemaking to establish categorical RACT for Brewing/Related Operations (Request: 7/18/19; Hearing: 10/17/19)
- 2020 +
  - Comply with RACT requirements





### Related Issues



#### Scope

- Number/source types/site specifics
- New SIP rules, revising SIP rules and state-only options

#### Process

- SIP RACT establishing categorical rules
- Existing equipment
- 2015 O3 Standard and associated Implementation Guidance

#### Timing

- RACT analysis
- Rule development
- Implementation
- EPA actions





# **Next Steps**

- Establish industry forum(s)
- Hold quarterly mtgs/calls w/ all stakeholders
  - Next mtg/call? March 15, 2017 @ 10-11 AM
- Brief RAQC and AQCC periodically

## Questions?

